

REMARKS

Claims 1-43 are currently pending, wherein Applicant propose to cancel claims 2, 7, 14, 20, 28, 29, 31, and 42-45, amend claims 1, 8, 9, 11, 13, 15, 17, 21, 22, 32 and 39 and add new claims 46-54. Applicants respectfully request entry of the above-identified amendment in view of the remarks presented herein below.

At the outset, Applicants notes with appreciation the indication that claims 34-38 are allowed and claims 6, 12, 18-21 and 24 contain allowable subject matter.

In paragraph 2 of the Office Action (“Action”), the Examiner objects to claims 3 and 14 for containing typographical errors. Applicants propose to amended claim 3 and cancel claim 14, thereby addressing the Examiner’s concerns.

In paragraph 5 of the Action, the Examiner rejects claims 29 and 42-45 under 35 U.S.C. §112, first paragraph, as allegedly failing to comply with the written description requirement. More specifically, the Examiner asserts that the specification does not discuss “micro holes” being included in the porous pad. Although Applicants disagree with the Examiner’s assertion, in order to expedite prosecution Applicants propose to cancel claims 29 and 42-45 thereby rendering this rejection moot.

In paragraph 8 of the Action, the Examiner rejects claims 29 and 42-45 under 35 U.S.C. 112, second paragraph, as allegedly being indefinite. More specifically, the Examiner asserts that the term “micro holes” is a relative term which renders the claim indefinite. Again, in order to expedite prosecution, Applicants propose to cancel claims 29 and 42-45 thereby rendering this rejection moot.

In paragraph 12 of the Action , the Examiner rejects claims 1, 22, 23 and 30 under 35 U.S.C. §102(e) as allegedly being anticipated by U.S. Patent No. 6,737,790 to Seki (“Seki”). Applicants respectfully traverse this rejection.

In order to support a rejection under 35 U.S.C. §102, the applied reference must teach each and every claimed element. In the present case, claims 1, 22, 23 and 30 are not anticipated by Seki for at least the reason that Seki fails to disclose each and every claimed element.

Upon entry of the above-identified amendments, independent claim 1 will define a plasma display panel that includes, *inter alia*, a display panel for displaying a picture, and a porous pad made of a material that absorbs noise/vibration and conducts heat provided at the display panel, the material including silicon and a foam agent, wherein the percentage amount of silicon is higher than the percentage amount of the foam agent.

Nowhere in Seki is there any disclosure of a porous pad made of a material that absorbs noise/vibration and conducts heat, the material including silicon and a foam agent, wherein the percentage amount of silicon is higher than the percentage amount of the foam agent.

Accordingly, independent claim 1 is patentable over Seki.

Upon entry of the above-identified amendments, independent claim 22 will define a plasma display device that includes, *inter alia*, a porous pad attached between the display panel and the frame, wherein the porous pad includes silicon and an urethane foam, the percentage amount of silicon being larger than the percentage amount of urethane foam. In addition, independent claim 30 will define a plasma display device that includes, *inter alia*, a porous pad between the display panel and the frame, the porous pad including a silicon material and a foam agent, wherein the percentage of the silicon material is greater than the percentage of the foam agent. Accordingly, independent claims 22 and 30 are patentably distinguishable over Seki for at least the reason that Seki fails to disclose a porous pad as claimed (see discussion above with respect to claim 1).

Claim 23 depends from independent claim 22. Therefore, claim 23 is patentable over Seki for at least those reasons presented above with respect to claim 22. Accordingly,

Applicants respectfully request entry of the above-identified amendment and withdrawal of the rejection of claims 1, 22, 23 and 30 under 35 U.S.C. §102(e).

In paragraph 17 of the Action, the Examiner rejects claims 42-45 under 35 U.S.C. §102(e) as allegedly being unpatentable over U.S. Patent No. 6,288,489 to Isohata ("Isohata"). Applicants propose to cancel claims 42-45 thereby rendering this rejection moot.

In paragraph 24 of the Action, the Examiner rejects claims 1-5, 7-11, 13-17, 22, 23, 25-33 and 39-41 under 35 U.S.C. §103(a) as allegedly being unpatentable over Isohata in view of U.S. Patent No. 6,794,026 to Ebihara ("Ebihara"). Applicants respectfully traverse this rejection.

In order to establish a *prima facie* case of obviousness, three criteria must be met. First, there must be some motivation to modify/combine the applied references. Second, there must be a reasonable expectation of success. Finally, the combination must teach each and every claimed element. In the present case, claims 1-5, 7-11, 13-17, 22, 23, 25-33 and 39-41 are not unpatentable over the combination of Isohata and Ebihara for at least the reason that the combination fails to disclose or suggest each and every claimed element.

Since both Isohata and Ebihara fail to disclose or suggest a plasma display panel that includes a porous pad including a silicon material and a foam agent, wherein the percentage of the silicon material is greater than the percentage of the foam agent as claimed, the combination of these two references cannot possibly disclose or suggest said element. Therefore, even if one skilled in the art were motivated to combine Isohata and Ebihara, which Applicants do not concede, the combination would still fail to render claims 1-5, 7-11, 13-17, 22, 23, 25-33 and 39-41 unpatentable for at least the reason that the combination fails to disclose each and every claimed element.

For at least those reasons presented above, Applicants respectfully request entry of the above-identified amendments and withdrawal of the rejection of claims 1-5, 7-11, 13-17, 22, 23, 25-33 and 39-41 under 35 U.S.C. §103.

New claims 46-54 are patentable over the cited prior art for at least the reason that the prior art fails to disclose or suggest a method of manufacturing a plasma display as claimed.

The application is in condition for allowance. Notice of same is earnestly solicited. If for any reason the Examiner finds the application other than in condition for allowance, Applicants request the Examiner call the undersigned attorney at (202) 496-7500 to discuss the steps necessary for placing the application in condition for allowance. All correspondence should continue to be sent to the below-listed address.

If these papers are not considered timely filed by the Patent and Trademark Office, then a petition is hereby made under 37 C.F.R. §1.136, and any additional fees required under 37 C.F.R. §1.136 for any necessary extension of time, or any other fees required to complete the filing of this response, may be charged to Deposit Account No. 50-0911. Please credit any overpayment to deposit Account No. 50-0911.

Dated: July 15, 2005

Respectfully submitted,

By Penny Caudle *Penny Caudle*
Reg. No. 46,607
Song K. Chung
Registration No.: 35,210
MCKENNA LONG & ALDRIDGE LLP
1900 K Street, N.W.
Washington, DC 20006

Attorney for Applicant